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**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

RUTH LARA, individually and as guardian of
her minor child J.S., on behalf of themselves
and those similarly situated,

Plaintiffs,

v.

PUFF BAR, NICK MINAS, PATRICK
BELTRAN, COOL CLOUDS
DISTRIBUTION, INC., UMAIS
ABUBAKER and SHAHID SHAIKH,

Defendants.

Case No. 2:20-cv-08030-SDW-LDW

**DEFENDANT NICK MINAS AND DEFENDANT PATRICK BELTRAN'S
NOTICE OF JOINDER IN DEFENDANT PUFF BAR'S REPLY IN SUPPORT OF
MOTION TO DISMISS PLAINTIFFS' SECOND AMENDED COMPLAINT**

Defendants Nick Minas and Patrick Beltran, by and through their undersigned counsel, and in support of their Motion to Dismiss the Second Amended Complaint, respectfully join in Defendant Puff Bar's Reply Memorandum in support of its motion to dismiss the Second Amended Complaint and incorporate by reference herein the arguments made and authorities cited therein.¹ The aforementioned Reply Memorandum, and arguments and authorities contained therein, apply equally to the claims brought against Defendants Minas and Beltran. The Court should dismiss the Second Amended Complaint with prejudice as against Defendants Minas and Beltran.

Dated: November 30, 2020

Respectfully Submitted,

THOMPSON HINE LLP

/s/ Brian Steinwascher

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¹ Contrary to Plaintiffs' supposition, Defendants Minas and Beltran have not moved to dismiss based on the Court's exercise of personal jurisdiction over them given the allegations in the Second Amended Complaint.

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CERTIFICATE OF SERVICE

I certify that on this date I caused Defendant Nick Minas and Defendant Patrick Beltran's Notice of Joinder in Defendant Puff Bar's Reply in Support of Motion to Dismiss Plaintiff's Second Amended Complaint to be filed with the Clerk of Court for the United States District Court for the District of New Jersey by using the CM/ECF system and understand that electronic notice of the filing will automatically be sent all counsel of record.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

s/ Brian Keahi Steinwascher
Brian Keahi Steinwascher

Dated: November 30, 2020